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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JENNIFER MARGARET ANGLIN,

Plaintiff(s),

vs.

ROUND MOUNTAIN GOLD
CORPORATION,

Defendant(s).

Case No. 3:16-cv-00245-HDM-VPC

**STIPULATED DISCOVERY
PLAN AND SCHEDULING
ORDER**

**SUBMITTED IN COMPLIANCE
WITH LOCAL RULE 26-1(e)**

Pursuant to the requirements of Fed. R. Civ. P. 26(f) and LR 26-1(e), Plaintiff and Defendant hereby submit the following Stipulated Discovery Plan and Scheduling Order in the above captioned matter.

A. Information Requested by Fed. R. Civ. P. 26(f):

1. Counsel for the parties conducted a meeting pursuant to Federal Rule of Civil Procedure 26 and Local Rule 26-1(d) on June 9, 2016. Pursuant to an agreement between the parties, the parties will serve initial disclosures in accordance with Federal Rule of Civil Procedure 26(a) on or before **Thursday, June 23, 2016.**

2. Discovery may be conducted on all discoverable matters relevant to issues raised by the Complaint (and amendments thereto), Answer, and any subsequent

1 pleadings, consistent with the Federal Rules of Civil Procedure and the Local Rules of this
2 District.

3 3. No changes in limitations, other than those set forth below, set by either
4 the Federal Rules of Civil Procedure or Local Rules for the District of Nevada are requested
5 at this time.

6 **B. Information Requested by LR 26-1(e):**

7 **1. *Discovery Cut-Off Date:***

8 Discovery will not take more than one hundred eighty (180) days from May 31, 2016,
9 which is the date of the filing of Defendant's Answer to Plaintiff's Complaint. All discovery
10 must be completed no later than **Monday, November 28, 2016**. When producing
11 documents responsive to a discovery request, the documents shall be numbered and the
12 responsive documents shall be specifically referred to by bates-number in the response.

13 **2. *Amending the Pleadings and Adding Parties:***

14 The date for filing motions to amend the pleadings or to add parties shall not be later
15 than ninety (90) days prior to the discovery cut-off date and, therefore, not later than
16 **Tuesday, August 30, 2016**. Any party causing additional parties to be joined or brought to
17 this action shall contemporaneously therewith cause a copy of this Order to be served upon
18 the new party or parties.

19 **3. *Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):***

20 The last day for disclosures required by Fed. R. Civ. P. 26(a)(2) concerning experts
21 shall be **Thursday, September 29, 2016**. The last day for disclosures regarding rebuttal
22 experts shall be **Monday, October 31, 2016**.

23 **4. *Dispositive Motions:***

24 The parties shall file dispositive motions not more than thirty (30) days after the
25 discovery cut-off date and, therefore, not later than **Wednesday, December 28, 2016**.

26 **5. *Pretrial Order:***

27 If no dispositive motions are filed, and unless otherwise ordered by this Court, the
28 Joint Pretrial Order shall be filed not more than thirty (30) days after the date set for filing
dispositive motions and, therefore, not later than **Friday, January 27, 2017**. In the event

dispositive motions are filed, the last day to file the Joint Pretrial Order shall be suspended until thirty (30) days after the ruling on the dispositive motions.

6. Interim Status Reports:

In accordance with Local Rule 26-3, an Interim Status Report will be filed by the parties with the Court sixty (60) days prior to the discovery cut-off date, and therefore, not later than **Thursday, September 29, 2016**.

C. Additional Deadlines:

1. *Extensions or Modifications of the Discovery Plan and Scheduling Order:*

In accordance with Local Rule 26-4, a stipulation or motion for modification or extension of this discovery plan and scheduling order must be made no later than twenty-one (21) days prior to the discovery cut-off date, and therefore, not later than **Monday, November 7, 2016**.

D. Certifications

1. By signing below, the parties make the following certifications:

- (a) The parties have met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and if applicable, early neutral evaluation. Early neutral evaluation is scheduled in this matter on August 17, 2016; and
- (b) The parties have considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).

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3 IT IS SO STIPULATED.
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5 By: [Signature] Dated: 6/15/16
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8 RICARDO N. CORDOVA, ESQ.
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14 *Attorneys for Defendant Round Mountain Gold Corporation*

15 By: [Signature: Luke A. Busby] Dated: 6/15/2016
16

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23 *Attorney for the Plaintiff*

24 **ORDER**

25 IT IS SO ORDERED.
26

27 June 17, 2016
28 DATED [Signature]
UNITED STATES MAGISTRATE JUDGE